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Attorneys for Defendant
BANK OF AMERICA, N.A.

Additional Counsel Listed on Signature Pages

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JENNIFER YICK, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A., and DOES 1-20,
inclusive,

Defendants.

Case No. 3:21-cv-00376-VC

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO ENLARGE TIME FOR BRIEFING
SCHEDULE IN RESPONSE TO PLAINTIFF
JENNIFER YICK'S MOTION TO
CONSOLIDATE THE RELATED CASES
PURSUANT TO CIVIL LOCAL RULE 6-2**

AS MODIFIED

Courtroom: 4 – 17th Floor
Judge: Hon. Vince Chhabria

Complaint filed: January 14, 2021

This document also relates to:

CARLOS RODRIGUEZ, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Case No. 3-21-cv-00494-VC

Judge: Hon. Vince Chhabria

Complaint filed: January 20, 2021

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Defendant.	
This document also relates to:	Case No. 3:21-cv-00547-VC
J. MICHAEL WILLRICH, on behalf of himself and all others similarly situated,	
Plaintiffs,	Judge: Hon. Vince Chhabria
v.	Complaint filed: January 22, 2021
BANK OF AMERICA, N.A., and DOES 1-20, inclusive,	
Defendants.	
This document also relates to:	Case No. 3:21-cv-00572-VC
LINDSAY MCCLURE, on behalf of herself and all others similarly situated,	
Plaintiff,	Judge: Hon. Vince Chhabria
v.	Complaint filed: January 25, 2021
BANK OF AMERICA, N.A., and DOES 1-20, inclusive,	
Defendants.	
This document also relates to:	Case No. 3:21-00615-VC
ROLAND OOSTHUIZEN and ROSEMARY MATHEWS, on behalf of themselves and all others similarly situated,	
Plaintiffs,	Judge: Hon. Vince Chhabria
v.	Complaint filed: January 26, 2021
BANK OF AMERICA, N.A., and DOES 1-30, inclusive,	
Defendants.	
This document also relates to:	Case No. 3:21-cv-00699
ROBERT L. WILSON, on behalf of himself and all others similarly situated,	
Plaintiff,	Judge: Hon. Vince Chhabria

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v.
BANK OF AMERICA, N.A., and DOES 1-20,
inclusive,

Defendants.

This document also relates to:

CHRISTOPHER MOSSON, on behalf of
himself and all others similarly situated,

Plaintiff,

v.
BANK OF AMERICA, N.A., and DOES 1-50,
inclusive,

Defendants.

This document also relates to:

CLARA CAJAS, on behalf of herself and all
others similarly situated,

Plaintiff,

v.
BANK OF AMERICA, N.A., and DOES 1-20,
inclusive,

Defendants.

Complaint filed: January 28, 2021

Case No. 3:21-cv-00743-VC

Judge: Hon. Vince Chhabria

Complaint filed: January 29, 2021

Case No. 3:21-cv-00869-VC

Judge: Hon. Vince Chhabria

Complaint filed: February 3, 2021

Pursuant to Civil Local Rule 6.2, Defendant Bank of America, N.A. (“Defendant” or “BANA”) and Plaintiffs in the related cases (as defined below) (together, “the Parties”), hereby stipulate and agree as follows:

WHEREAS, Plaintiff Yick filed her complaint in *Yick v. Bank of America, N.A., et al.*, Case No. 3:21-cv-00376, on January 14, 2021, which was served on BANA on January 27, 2021, and an initial case management conference was scheduled for April 16, 2021;

WHEREAS, Plaintiff Rodriguez filed his complaint in *Rodriguez v. Bank of America, N.A.*, Case No. 3:21-cv-00494, on January 20, 2021, which was served on BANA on February 5, 2021, and an initial case management conference was scheduled for April 23, 2021;

WHEREAS, Plaintiff Willrich filed his complaint in *Willrich v. Bank of America, N.A., et al.*, Case No. 3:21-cv-00547, on January 22, 2021, which was served on BANA on February 3, 2021, and an initial case management conference was scheduled for April 29, 2021;

WHEREAS, Plaintiff McClure filed her complaint in *McClure v. Bank of America, N.A., et al.*, Case No. 3:21-cv-00572, on January 25, 2021, which was served on BANA on January 29, 2021, and an initial case management conference was scheduled for April 29, 2021;

WHEREAS, Plaintiffs Oosthuizen and Mathews filed their complaint in *Oosthuizen and Mathews v. Bank of America, N.A., et al.*, 3:21-cv-000615, on January 26, 2021, which was served on BANA on February 2, 2021, and an initial case management conference was scheduled for April 27, 2021;

WHEREAS, Plaintiff Wilson filed his complaint in *Wilson v. Bank of America, N.A. et al.*, Case No. 3:21-cv-00699, on January 28, 2021, which has not yet been served on BANA, and an initial case management conference was scheduled for May 3, 2021;

WHEREAS, Plaintiff Mosson filed his complaint in *Mosson v. Bank of America, N.A., et al.*, Case No. 3:21-cv-00743, on January 29, 2021, which was served on BANA on February 18, 2021, and an initial case management conference was scheduled for April 30, 2021;

WHEREAS, Plaintiff Cajas filed her complaint in *Cajas v. Bank of America, N.A., et al.*, Case No. 3:21-cv-00869, on February 3, 2021, which was served on BANA on February 23,

2021, and an initial case management conference was scheduled for May 6, 2021;

WHEREAS, Plaintiff Yick filed Administrative Motions to Consider Whether Cases Should Be Related Pursuant to Civil Local Rules 3-12 and 7-11;

WHEREAS, United States District Judge Vince Chhabria, the presiding judge in the lowest-numbered case, *Yick v. Bank of America, N.A.*, Case No. 3-21-cv-00376, issued an order on February 11, 2021, finding that case to be related to the seven additional cases listed in the preceding paragraphs (together, the “Related Cases”) (Yick Dkt. No. 29);

WHEREAS, Plaintiff Yick filed a motion to consolidate the Related Cases pursuant to Federal Rule of Civil Procedure 42 on February 12, 2021 (the “Consolidation Motion”) (Yick Dkt. No. 34), set to be heard on March 25, 2021;

WHEREAS, all other plaintiffs in the Related Cases have joined in the Motion (Yick Dkt. Nos. 35-38, 40-42);

WHEREAS, Defendant reserves all rights in relation to the Consolidation Motion, including the right to oppose the Motion;

WHEREAS, the Parties agree that there is good cause to extend Defendant’s time to file its responsive pleading(s) and set a briefing schedule for any motion to dismiss;

WHEREAS, extending the deadline for Defendant’s responsive pleading(s) will likely require altering the date of the initial case management conference scheduled for some, if not all, of the Related Cases;

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by the Parties, through their counsel of record, subject to the Court’s approval, that:

(1) Defendant need not respond to the complaints in the Related Cases at this time;

(2) If the Court grants the Consolidation Motion, Defendant’s responsive pleading shall be due **21** days after the filing of the Consolidated Complaint; Plaintiffs’ opposition to any motion to dismiss shall be due **14** days thereafter; and any Reply shall be due **7** days thereafter.

(3) If the Court denies the Consolidation Motion, in each of the Related Cases,

1 Defendant's responsive pleading shall be due forty-five (45) days following the entry
2 of an order denying the Consolidation Motion; any opposition to a motion to dismiss
3 shall be due thirty (30) days thereafter; and any Reply shall be due fifteen (15) days
4 thereafter.

5 A declaration pursuant to Civil Local Rule 6-2 accompanies this document.
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10 Dated: February 26, 2021

Respectfully Submitted,

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1 Dated: February 26, 2021

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Attorneys for Plaintiff CLARA CAJAS

1 PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO
2 ORDERED **AS MODIFIED ABOVE**

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4 DATED this 12, day of March, 2021.

